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9 UNITED STATES BANKRUPTCY COURT  
10 EASTERN DISTRICT OF CALIFORNIA  
11 [Sacramento Division]

12 In re:

13 GREGORY G. SMITH, M.D.,  
14 A PROFESSIONAL  
15 CORPORATION,

16 Debtor.

Case No. 20-24783-A-11  
Docket Control No. MHK-4

Date: February 22, 2021  
Time: 1:30 p.m.  
Dept: A (Courtroom 28)  
Hon. Fredrick E. Clement

17 **JOINT STATUS REPORT FOR**  
18 **DEBTOR IN POSSESSION'S OBJECTION TO PROOF OF CLAIM**  
19 **NO. 1 FILED BY MEMORY REHABILITATION MED. GROUP**

20 Gregory G. Smith, M.D., a Professional Corporation, as debtor in possession (the  
21 "Debtor") and Memory Rehabilitation Medical Group (the "Claimant") hereby submit  
22 their Joint Status Report for the above-referenced contested matter.

23 **I. PROCEDURAL POSTURE**

24 1. At the initial hearing on December 21, 2020, the parties argued their  
25 positions, and the court continued the hearing to February 22, 2021, thereby permitting  
26 the parties to serve discovery.

27 2. After consultation between counsel, the Debtor's counsel served on the  
28 Claimant a set of interrogatories and a request for production of documents. A  
response is due on or about February 10, 2021, but it has not yet been served on the  
Debtor's counsel.

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1           3.     The Claimant has not served discovery in connection with this contested  
2 matter.

3                               **II. SUGGESTIONS FOR BRIEFING SCHEDULE**

4           4.     Depending on the content of the Claimant's responses to the Debtor's  
5 pending discovery, it may be necessary that the Debtor seek discovery of Gregory G.  
6 Smith, M.D., the individual whose signature appears on the purported contract for  
7 services on which the Claimant has based its claim. As such, the parties suggest that a  
8 continued hearing be set on the Objection for April 20, 2021 at 1:30 p.m., at which  
9 time a final hearing could be set.

10     Dated: 2-2-21

REYNOLDS LAW CORPORATION

11  
12     By: 

13     Stephen M. Reynolds  
14     Attorneys for the Claimant

15     Dated: Feb. 2, 2021

MEEGAN, HANSCHU & KASSENBRICK

16  
17     By: 

18     Anthony Asebedo  
19     Attorneys for the Debtor  
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